

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

<b>IN RE: JOHNSON &amp; JOHNSON TALCUM POWDER PRODUCTS MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION</b>  <b>This document relates to: HILL et al. v. JOHNSON &amp; JOHNSON et al. 3:18-cv-08344-FLW-LHG</b>	<b>MDL No. 2738 (FLW) (LHG)</b>  <b>Hearing Date:</b>  <b>Courtroom: 5E</b>
--	---

**PLAINTIFF LINDA HILL'S RESPONSE TO JOHNSON & JOHNSON'S STATEMENT  
OF MATERIAL FACTS**

Pursuant to Rule 56.1(a) of the Local Rules of the United States District Court for the District of New Jersey, Plaintiff, by undersigned counsel, respectfully submits the following response to the Johnson & Johnson Defendant's Statement.

The paragraph numbers for this Response refers to the corresponding numbers in defendant's Statement:

4. Admitted.

5. Admitted.

6. Admitted.

7. Denied. There is nothing in the record to support that Mrs. Hill would have filed in the Western District of Virginia absent the MDL. Furthermore, it is disputed that she requests transfer back to the Western District of Virginia upon completion of pretrial proceedings. The records is clear, Mrs. Hill waived lexicon. (Dkt. No.14108). By waiving *Lexecon*, Plaintiff no longer "seeks transfer" back to Virginia and thus the stipulation on Virginia law is no longer

applicable.

DATED: July 9, 2021

Respectfully submitted,

**THE MILLER FIRM, LLC**

By: /s/ Tayjes M. Shah

Tayjes M. Shah  
The Sherman Building  
108 Railroad Avenue  
Orange, Virginia 22960  
Tel: (540) 672-4224  
Fax: (540) 672-3055  
E-Mail: tshah@millerfirmllc.com